

1 Kris LeFan, Esq., SBN 278611  
2 LOWE & ASSOCIATES, P.C.  
3 11400 Olympic Blvd., Suite 640  
4 Los Angeles, CA 90064  
5 Telephone: (310) 477-5811  
6 Facsimile: (310) 477-7672  
7 kris@lowelaw.com

8 Attorneys for Defendants  
9 NewTvPad Ltd. Company and Liangzhong Zhou

10 IN THE UNITED STATES DISTRICT COURT  
11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 CHINA CENTRAL TELEVISION, a  
13 China company, *et al.*

14 Plaintiffs,

15 v.

16 CREATE NEW TECHNOLOGY, (HK)  
17 LIMITED, A Hong Kong Company, et  
18 al.,

19 Defendants.

Case No. 2:15-cv-01869-MMM

DECLARATION OF  
LIANGZHONG ZHOU

Hon. Margaret M. Morrow

20 **DECLARATION OF LIANGZHONG ZHOU**

21 1. I, LIANGZHONG ZHOU, am the sole owner of defendant newTVpad Ltd. Co. I make  
22 this declaration in my individual capacity as a named defendant, as well as on behalf of defendant  
23 newTVpad Ltd. Co. (collectively as "DECLARANT"). I make this declaration for the purpose of  
24 reporting our compliance with the Consent Judgment and Permanent Injunction as to newTVpad Ltd.  
25 Co. and Liangzhong Zhou ("Order") entered by this Court on July 20, 2015.

26 2. DECLARANT was previously engaged in the business of selling a device known as  
27 "TVpad" via the Internet.

28 3. DECLARANT has not sold any TVpad device since being served with Complaint of

1 the above-captioned case, and has no plan to sell any TVpad device in the future.

2 4. DECLARANT has disabled its website through which it had previously sold the  
3 TVpad device and instead posted a customer notice pursuant to the settlement agreement with  
4 Plaintiffs.

5 5. DECLARANT has provided plaintiffs' counsel with information required under  
6 Paragraph 35 of the Order regarding all domain names owned, leased or operated by DECLARANT  
7 that are used in connection with the activities enjoined under Paragraphs 31 and 32 of the Order.  
8

9 6. DECLARANT has not engaged in any of the activities enjoined under Order since its  
10 issuance and has no plan to conduct any of the activities in the future.  
11

12 I declare under penalty of perjury that the foregoing is true and correct, and that the  
13 declaration is executed on August 26, 2015 in Dallas, Texas.  
14

15  
16   
17

18  
19 Liangzhong Zhou on behalf of himself and newTVpad Ltd. Co.  
20  
21  
22  
23  
24  
25  
26  
27  
28